

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**CONSUMER FINANCIAL
PROTECTION BUREAU,**

Plaintiff,

v.

**TOWNSTONE FINANCIAL,
INC., et al.,**

Defendants.

Civil Action No. 1:20-cv-04176

Judge Franklin U. Valderrama

Magistrate Judge Gabriel A. Fuentes

JOINT MOTION FOR ENTRY OF AGREED CONFIDENTIALITY ORDER

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, the Court's Standing Order on Confidentiality or Protective Orders, and Judge Fuentes' Standing Order for Civil Cases, Plaintiff Consumer Financial Protection Bureau (Plaintiff or CFPB) and Defendants Townstone Financial and Barry Sturner (together, Defendants), by and through their attorneys, hereby move this Court for entry of an Agreed Confidentiality Order. In support of this motion, the parties state as follows:

1. Federal Rule 26(c) authorizes the Court to enter a protective order regarding discovery for good cause shown. Fed. R. Civ. P. 26(c).

2. The parties anticipate that confidential materials will be disclosed during the course of this litigation. Such materials may include, but are not limited to, confidential information related to Defendants' financial records containing personal identifying information or the identity of peer lenders as alleged in the Complaint.

3. Accordingly, good cause exists for the issuance of a protective order because the confidential materials described above merit protection from public disclosure.

4. The parties have conferred and agreed upon the entry of a proposed Agreed Confidentiality Order, which separately will be submitted for consideration by the Court.

WHEREFORE, the parties respectfully request that the Court grant this motion and enter the parties' Agreed Confidentiality Order.

Dated: October 31, 2022

Respectfully submitted,

**CONSUMER FINANCIAL
PROTECTION BUREAU**

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**TOWNSTONE FINANCIAL,
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CERTIFICATE OF SERVICE

The undersigned hereby certify that on October 31, 2022, I electronically filed the foregoing document with the Clerk of the Court via the CM/ECF system, which will cause a copy to be served upon counsel of record.

/s/ Steven M. Simpson
STEVEN M. SIMPSON